



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

May 14, 2007

Reply To
Attn Of: ETPA-088

Ref: 05-061-AFS

Chad Benson
Acting Lochsa District Ranger
Route 1, Box 398
Kooskia, ID 83539

Dear Ms. Benson:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (FEIS) for the **White/White Project** (CEQ No. 20070135), Clearwater National Forest, in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

The final EIS proposes four action alternatives and a no action alternative to implement vegetative management and watershed improvement while providing goods and services. EPA had environmental concerns on the draft EIS regarding the potential impacts to water quality, sediment yields, aquatic habitat, source water protection, and lack of information regarding varying degrees of impacts to resources among alternatives.

The Preferred Alternative identified in the final EIS is Alternative 4. Alternative 4 would have the greatest acres regeneration harvest. We support the watershed improvement activities proposed and that the project incorporates the PACFISH buffer guidelines and the linkage that these guidelines and EPA Region 10's Source Water guidance would be applied to protect downstream source water protection areas. We also appreciate the inclusion of the Biological Assessment/Biological Evaluation as an appendix to the FEIS. We feel that our concerns regarding source water have been resolved from the Response to Comments. We understand that the selected Alternative is designed to improve water quality for temperature and sediment as well as improve fish habitat and we appreciate the list of impaired streams and parameters that they are listed for. We recognize the additional information and response to our comments on temperature and sediment, which resolved some of our water quality concerns. However, the list of parameters also included bacteria, nutrients, oil and grease, and inorganics and we continue to have concerns regarding the proposed project's ability to improve water quality for these constituents since the FEIS does not appear to mitigate for these or discuss their sources. Also, it appears that the FEIS did not include the requested map of streams including listed streams and this would have aided in the ease of review especially if the stream map was overlaid with the proposed prescriptions.

The FEIS discusses cumulative effects and lists grazing and placer mining as current and future activities. We recommend that best management practices (BMPs) be used in the project area to reduce impacts from grazing and reduce nutrient levels and other associated contaminants to promote beneficial uses for impaired streams. Also, placer mining increases sediment and turbidity in the water column and therefore, we encourage the U.S. Forest Service to continue to find opportunities to minimize potential adverse impacts to streams during permitting for placer mining and implementing fuels treatments, timber sales and layout, and harvest activities. We also recommend that this project comply with Idaho Department of Environmental Quality's draft Guidance for Forest Practices Discharging Sediment into 303(d) listed Waterbodies. This guidance recognizes projects that may cause the addition of sediment in the short-term, yet maintain or decrease the sediment load within the watershed through sediment reduction activities in the long-term. To determine whether the pollutant load remains constant or decreases in the watershed, such sediment reduction activities should be considered and take into account the following:

That the sediment reduction projects should preferably occur within the same general timeframe as any sediment loading from the timber projects. The draft guidance established 3-5 years from the completion of the timber project activities causing sediment discharge as a general timeframe for sediment reduction projects or mitigation to occur. It is also acknowledged in the guidance that activities such as road obliteration cannot be completed at the same time or prior to timber harvest and that the full sediment reduction benefits from projects would be realized over a much longer time span.

The guidance also states that a sediment reduction activity should have reasonably secure funding or other assurance of implementation for its sediment reduction or offset benefits to be relied upon. Lastly, any short term substantial sediment or other load increase resulting from a sediment reduction activity should be considered in evaluating reduction of offset benefits.

An additional concern we had was regarding the absence of a summary table that compares and contrasts the potential impacts among alternatives to the various resources (e.g. water quality, fisheries, wildlife, air quality, etc). The FEIS includes Table 2-1 (page 42) that compares alternatives by issue (i.e. regeneration harvest and tree species composition and density) and Table 2-2 (page 43) that compares the alternatives response to the Purpose and need (i.e. vegetative rehabilitation, watershed improvement, and goods and services). These are helpful tables and clearly depict the acres of vegetation treatments, miles of roads decommissioned and reconditioned, and volume of board feet offered for goods and services. However, the FEIS does not include the recommended table that clearly presents the environmental impacts of the proposal and alternatives in comparative form and thus sharply defining the issues as stated in 40 CFR § 1502.15. Furthermore, it appears that the FEIS nor Record of Decision identify the environmentally preferred alternative as directed in 40 CFR § 1505.2 (b). Also, we recommended that the environmentally preferred alternative be identified in the FEIS in our comments on the draft EIS dated May 30, 2006. Our comments on the alternatives were not responded to in the Response to Comments section and therefore, it is

unclear which alternative would be most beneficial to the environment. We recommend that the environmentally preferred alternative be identified for all NEPA projects before an alternative is selected.

EPA appreciates the opportunity to provide comments on the White/White Project FEIS. If you have any questions please contact Lynne McWhorter at (206) 553-0205 or via email at mcwhorter.lynne@epa.gov or myself at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit

cc: Idaho Operations Office